

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|-----------------------------|---|--------------------|
| In the Matter of |) | '85 FEB -8 A11 :00 |
| |) | |
| THE CLEVELAND ELECTRIC |) | Pocket Nos. 50-440 |
| ILLUMINATING COMPANY |) | 50-441 |
| |) | |
| (Perry Nuclear Power Plant, |) | |
| Units 1 and 2) |) | |

AFFIDAVIT OF
GARY WINTERS
ON CONTENTION Q

| | |
|------------------------------|-------|
| County of Dauphin |) |
| |) ss. |
| Commonwealth of Pennsylvania |) |

GARY WINTERS, being duly sworn, deposes and says:

1. I am presently a Project Coordinator and Emergency Planning Specialist for the Emergency Management Services Department of Energy Consultants. My business address is 2101 North Front Street, Harrisburg, Pennsylvania 17110. My responsibilities include coordination of offsite resource inventory and assessment efforts involving Lake, Ashtabula and Geauga Counties with respect to the Perry Nuclear Power Plant. Project activities have included the interview of response agency/facility administrators for resource information, preparation of county resource documents and analysis of offsite resource capability to respond to an accident at the Perry Plant. A current statement of my professional qualifications and experience is attached hereto. I have

personal knowledge of the matters stated herein and believe them to be true and correct. I make this affidavit in support of Applicants' Motion For Summary Disposition of Contention Q.

2. The purpose of this affidavit is to demonstrate the availability of sufficient resources to evacuate all schools (grades K-12) within the plume exposure pathway emergency planning zone ("EPZ") in a single trip, to identify the specific measures being taken to assure that parents of children in schools within the EPZ will cooperate with plans for the evacuation of the schools, and to explain that -- even if some parents did attempt to pick up their children at school -- the evacuation of schools would not be impeded.

I. School Buses

3. A recent survey of the superintendents of all school districts within the Perry EPZ indicates that current total enrollment in EPZ schools is approximately 19,802 students.

4. The licensed capacity for EPZ and support school buses^{1/} is an average of 59.3 students per bus; the actual evacuation capacity is an average of 55.0 students per bus.^{2/}

^{1/} Support school buses are school buses from schools within the three county area (but outside the EPZ) which are available to assist with the evacuation of EPZ schools in the event of an emergency at Perry.

^{2/} The average licensed capacity of EPZ and support school buses was determined by averaging the licensed capacity of these buses. The average actual evacuation capacity of these buses was determined by matching licensed capacity

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Thus, the actual number of buses needed to evacuate EPZ schools in a single trip -- based on actual evacuation capacity -- is 384 buses.^{3/} A county-by-county breakdown is shown in Table A below.

TABLE A
SCHOOL BUSES

| County | Support Buses | Buses Within EPZ | Total Buses Needed For School Evacuation | Surplus Buses |
|-----------|------------------|------------------------|---|------------------|
| Lake | 246 | 120 | 303 | 63 |
| Ashtabula | 182 | 34 | 64 | 152 |
| Geauga | <u>65</u> | <u>14</u> | <u>17</u> | <u>62</u> |
| TOTALS | 493 | 168 | 384 | 277 |

5. As Table A indicates, the schools within the EPZ do not have sufficient bus capacity to evacuate their students in a single trip without assistance. However, Standard Operating Procedures developed with school districts in the three

(Continued)

to grade level for all schools within the EPZ, and assigning two or three students per seat (based on three per seat for grades K-9, and two per seat for grades 10-12). The total number of buses needed was then determined, and an average per bus capacity calculated.

^{3/} The actual number of buses needed to evacuate EPZ schools in a single trip was determined by matching actual evacuation seat capacity to individual school enrollment and calculating the number of buses needed to evacuate each school in a single trip.

counties provide for the use of resources (school buses and drivers) from outside the EPZ to evacuate schools within the EPZ in an emergency. See also Lake County Plan,^{4/} §§ J-06, J-11, and Attachment A-1; Ashtabula County Plan,^{5/} Appendices 6 and 9, and § J.4.1; Geauga County Plan,^{6/} Appendices 4 and 24. Letters of agreement are being obtained for the use of these resources. Table A clearly demonstrates the availability of adequate numbers of buses to evacuate all school students from the EPZ in a single trip. Indeed, Table A indicates a surplus of 277 buses available within the three counties, over and above the buses needed to evacuate the schools in the EPZ.

II. Bus Drivers

6. Table B below shows the pool of licensed school bus drivers (both regular and substitute drivers) available within the three counties to support evacuation in the event of an emergency at the Perry Plant. As Table B indicates, there are many more than enough school bus drivers available to drive the 384 buses needed to evacuate the schools within the EPZ in a single trip.

^{4/} Lake County Emergency Response Plan For The Perry Nuclear Power Plant (Rev. 3, October 1984).

^{5/} Ashtabula County Radiological Emergency Preparedness Plan (May 10, 1984).

^{6/} Geauga County Radiological Emergency Response Plan (December 1983) (including Change No. 2 dated July 1984).

TABLE B
SCHOOL BUS DRIVERS

| <u>County</u> | <u>Regular</u> | <u>Substitute</u> | <u>Totals</u> |
|---------------|----------------|-------------------|---------------|
| Lake | 314 | 78 | 392 |
| Ashtabula | 174 | 68 | 242 |
| Geauga | 65 | 19 | <u>84</u> |
| | | | 718 |

7. Each of the three county plans provides for the training of emergency workers, including bus drivers. Lake County Plan, Attachment 0-1; Ashtabula County Plan, Appendix 34; Geauga County Plan, Appendix 36. The training being provided to each bus driver prior to fuel load includes (at a minimum):

- a. An explanation of basic radiation concepts (including the use of dosimetry).
- b. An overview of the offsite emergency plans.
- c. Instruction on each driver's specific duties.

In addition, the training includes making the bus drivers aware of the advantages of informal pre-emergency family contingency planning.

8. All school bus drivers assisting with the evacuation of schools within the plume EPZ in the event of an emergency at Perry would be provided with personnel dosimetry, both self-reading and permanent record types.

III. Parents' Response

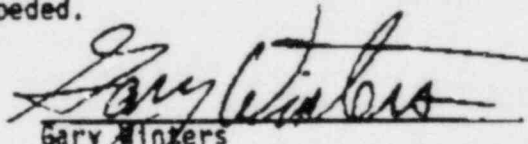
9. The EBS announcements for broadcast in the event of an evacuation will advise parents of the evacuation of the schools and of the location to which each school's students are being evacuated. The EBS announcements also will emphasize that parents should pick up their children at the appropriate receiving school outside the EPZ. The emergency public information brochure (for distribution throughout the EPZ prior to fuel load, and annually thereafter) will provide this same information about school evacuation, and will also instruct parents not to go to the schools to pick up their children. Lake County Plan, §§ G-01, G-02, G-03; Ashtabula County Plan, §§ E.4, G.2; Geauga County Plan, §§ E-6, G-3.

10. The offsite plans for the Perry EPZ are designed to facilitate the expeditious evacuation of school children, directly from their schools within the EPZ to predesignated receiving schools (reception centers) outside the EPZ. In the event of an emergency at Perry, evacuation of approximately half the schools within the EPZ would begin within 15 minutes of the order to evacuate. Therefore, many school children would already be enroute to receiving schools by the time parents could receive and react to notification of an evacuation and travel to the schools.

11. Nevertheless, even if some parents ignored the information provided in the brochure and in the EBS broadcasts and did go to the schools to pick up their children in an

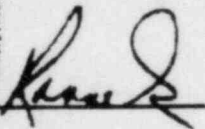
emergency, school evacuation would not be seriously impeded. Normal school dismissal procedures would be followed, including the stationing of school personnel to direct buses out of the loading areas, and to prevent extraneous traffic from entering the loading area, if necessary.

12. In summary, ample resources (school buses and drivers) are available to evacuate all schools within the EPZ in a single trip. Provisions for the dissemination of information about school evacuation in an emergency provide assurance that parents of children in schools within the EPZ will cooperate with plans for the direct evacuation of their children to receiving schools outside the EPZ. Nevertheless, even if some parents did attempt to pick up their children at school, the evacuation of schools would not be impeded.


Gary Winters



and sworn to before
day of February, 1985.



My Commission expires: JENNIE H. BURRELL, NOTARY PUBLIC
HARRISBURG, DAUPHIN COUNTY
BY COMMISSION EXPIRES DEC. 12, 1988
Member, Pennsylvania Association of Notaries



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Resume Current 01-11-85

GARY A. WINTERS

Education

1975

Bachelor of Science - Law Enforcement
Pennsylvania State University
University Park, Pennsylvania

Experience

9-81 to Present

Energy Consultants
Harrisburg, Pennsylvania

Planner/Trainer, Emergency Management Services. Responsible for provision of direct consultant services to assist state and local governments and industry in emergency management planning, procedure preparation and program accreditation/licensing. Recent project assignment has included coordinating and performing a detailed audit of the offsite emergency preparedness program in support of the Perry Nuclear Power Plant Atomic Safety and Licensing Board hearings. Assignment as project coordinator involved responsibility for development of audit criteria; plan/procedure review; documentation of program weaknesses; and resource verification. Prior project assignments have included:

- Development of four county radiological emergency response plans in support of the Callaway Plant;
- Development of local emergency response agency implementing procedures in support of the Waterford 3 Steam Electric Station; and
- Revision of a county radiological emergency response plan in support of the Beaver Valley Power Station.

4-76 to 9-81

Dauphin County
Harrisburg, Pennsylvania

Juvenile Court Probation Officer. Managed caseloads, investigated cases of delinquency, prepared legal documents, and testified in court hearings; coordinated the delivery of human services to delinquent youth among various public and private institutions. Advanced to Assistant Supervisor of Predispositional Services.

9-67 to 10-70

U.S. Army
12th U.S. Army Security Agency Field Station
Chitose, Japan

Non-Morse Intercept Operator for the U.S. Army Security Agency. Advanced to search operator, Specialist 5, quality controller, and shift leader. Received a "top secret" security clearance.